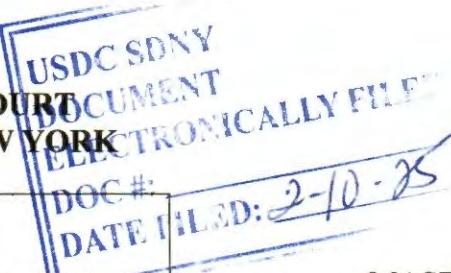


UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

In re

CUSTOMS AND TAX ADMINISTRATION
OF THE KINGDOM OF DENMARK
(SKATTEFORVALTNINGEN) TAX REFUND
SCHEME LITIGATION



MASTER DOCKET

18-md-2865 (LAK)

This document relates to:

19-cv-01785; 19-cv-01867; 19-cv-01893;
19-cv-01781; 19-cv-01783; 19-cv-01866;
19-cv-01895; 19-cv-01794; 19-cv-01865;
19-cv-01904; 19-cv-01798; 19-cv-01869;
19-cv-01922; 19-cv-01800; 19-cv-01788;
19-cv-01870; 19-cv-01791; 19-cv-01792;
19-cv-01928; 19-cv-01926; 19-cv-01868;
19-cv-01929; 19-cv-01803; 19-cv-01806;
19-cv-01906; 19-cv-01801; 19-cv-01894;
19-cv-01808; 19-cv-01810; 19-cv-01809;
18-cv-04833; 19-cv-01911; 19-cv-01898;
19-cv-01812; 19-cv-01896; 19-cv-01871;
19-cv-01813; 19-cv-01930; 19-cv-01815;
19-cv-01818; 19-cv-01931; 19-cv-01918;
19-cv-01873; 19-cv-01924; 19-cv-10713.

JOINT STIPULATION

IT IS HEREBY STIPULATED AND AGREED by and among counsel for the Plaintiff

Skatteforvaltningen (“SKAT”) and John van Merkensteijn that:

1. To the extent that the jury answers question 25 of the verdict form by entering the amount of \$36,812,386.51, the Parties agree that this amount will be reduced by \$47,388.59 for the purpose of any final judgment.

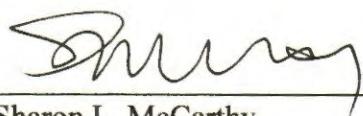
Dated: New York, New York
February 10, 2025



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Bernina Pension Plan, Bernina Pension Plan
Trust, Michelle Investments Pension Plan,
Omineca Pension Plan, Omineca Trust, Remece
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Pension Plan, RJM Capital Pension Plan Trust,
Routt Capital Pension Plan, Routt Capital Trust*

SO ORDERED

LEWIS A. KAPLAN, USDI

2/10/25